

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 22-CV-989

APPROXIMATELY 32,133.63 TETHER (USDT)
CRYPTOCURRENCY FROM BINANCE
ACCOUNT NUMBER ENDING IN 8770,

Defendant.

NOTICE OF COMPLAINT FOR CIVIL FORFEITURE OF PROPERTY

To: The owner of Binance account ending 8770 registered to Koriya Aveshbhai Hanifbhai
c/o Parth Gadhavi
9-27, Maivan na utara pase, Dhrangadhra,
Surendranagar, Gujarat
India 36310

Notice is Hereby Given that:

1. A complaint for Civil Forfeiture *in rem* has been filed in the United States District Court for the Eastern District of Wisconsin on the 29th day of August, 2022, by the United States Attorney for the Eastern District of Wisconsin, against the above-named defendant property.

2. The Complaint for Civil Forfeiture *in rem* (copy attached) seeks the forfeiture of the above-named defendant property pursuant to 18 U.S.C. §§ 981(a)(1)(A), 981(a)(1)(C) and 984 because the defendant property constitutes or was derived from proceeds traceable to an offense constituting “specified unlawful activity” – namely, wire fraud, committed in violation of 18 U.S.C. § 1343, and because it was involved in, or is traceable to funds involved in, money laundering transactions in violation of 18 U.S.C. §§ 1956 and 1957.

3. Any claimant of, in, or to the defendant property must file a verified claim meeting the requirements of Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions with the Clerk of the United States District Court for the Eastern District of Wisconsin, 517 East Wisconsin Avenue, Room 362, Milwaukee, Wisconsin 53202 within thirty-five (35) days of the date of this notice, or within such additional time as may be allowed by the Court, and must file an answer to the Complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure within twenty-one (21) days after filing the claim.

4. Supplemental Rule G(5)(a) provides in pertinent part: “The claim must: (A) identify the specific property claimed; (B) identify the claimant and state the claimant’s interest in the property; (C) be signed by the claimant under penalty of perjury; and (D) be served on the government attorney.”

5. Any claimant of, in, or to the defendant property is directed to serve a copy of the claim and any pleadings filed, upon the United States Attorney for the Eastern District of Wisconsin, 517 East Wisconsin Avenue, Room 530, Milwaukee, Wisconsin 53202, Attention AUSA Bridget J. Schoenborn.

Executed and sent this 1st day of September, 2022, at Milwaukee, Wisconsin.

RICHARD G. FROHLING
United States Attorney

By: s/BRIDGET J. SCHOENBORN
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